

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

UNITED STATES OF AMERICA,

v.

MICHAEL HUBBARD,

Defendant.

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CRIMINAL CASE NO.:
1:19-cr-00179

DEFENDANT MICHAEL HUBBARD PROPOSED
VOIR DIRE QUESTIONS

Defendant Michael Hubbard respectfully requests permission to ask the following *voir dire* questions to examine prospective jurors:

Juror Backgrounds

1. Have you ever served as a juror in a criminal or civil case, or as a grand juror?
2. Have you, a member of your family, or a close friend ever been the victim or witness of a crime?
3. Have you, or any member of your family, or any close friend ever been arrested, a defendant in a criminal case, or accused of a criminal offense?
4. Have you ever testified in any civil or criminal trial?
5. Have you, or any member of your family, or any close friend ever been an informant or cooperator for any federal, state, or local law enforcement agency?
6. Do any of you know the Defendant, Michael Hubbard? If yes, please explain.

7. Do any of you know any of the attorneys in this case? [List attorneys]. If yes, please explain.

8. Do any of you know any of the witnesses in this case? [List witnesses]. If yes, please explain.

9. Have you heard or read any news accounts about this case? If yes, please explain.

Juror Experiences Relating to Case

10. Please raise your hand if you're familiar with the BP Gas Station located at the intersection of Hill Street and Memorial Drive in southeast Atlanta.

11. Have any of you, a member of your family, or a close friend ever worked as a gas station attendant?

12. Have any of you, a member of your family, or a close friend ever called 911 about suspicious activity?

13. Have any of you, a member of your family, or a close friend ever worked for the government?

14. Do any of you have strong feelings about guns?

Juror Views on the Criminal Justice Process

15. Would you give more credit or weight to the testimony of a person who is employed by the United States government?

16. Do any of you have any strong feelings about criminal defense attorneys or lawyers in general?

17. The Defendant in this case, Michael Hubbard, is entitled to a fair and impartial trial. Does anyone have any difficulty with this rule?

18. Michael Hubbard, the Defendant in this case is presumed to be innocent of any crime and does not have to produce any evidence at any time. Does anyone have any difficulty with these rules?

19. Does anyone believe that the Defendant, Michael Hubbard, should be required to prove that he is innocent?

20. The Defendant need not testify. He can remain silent and this cannot be held against him in any way. Does anyone have any difficulty with these rules?

21. The prosecution is required to prove the Defendant, Michael Hubbard, guilty beyond a reasonable doubt. Does anyone have any difficulty with this rule?

22. In order to convict a defendant of any criminal offense charged, all 12 jurors must render a unanimous decision. Does anyone have any difficulty with this rule?

23. Each juror is entitled to vote their own individual conscience during deliberations. During deliberations, if you are part of a minority position, or you are the minority position, can you stand for your beliefs and continue to vote your conscience and not be persuaded simply by the sheer number of jurors who hold the opposite view?

24. Does anyone believe that the Government would not charge innocent people with crimes?
25. Is the mere fact that charges have been brought against Mr. Hubbard at all troubling to anyone?
26. Will you be able to follow the law based on the instructions provided by the Court, whether you personally agree with the law or not?
27. Have any of you formed an opinion of this case already? If yes, please explain.
28. Do any of you have any personal, moral, or religious beliefs which would cause you to question whether you could be a fair and impartial juror in this case?
29. Is there any reason why you might not wish to sit as a juror or should not sit as a juror in this case which the attorneys or the Court should know about?

Respectfully submitted, this 2nd day of March 2021.

/s/ Lawanda N. Hodges
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of March, 2021, the undersigned electronically filed the foregoing filing using the CM/ECF system, which will automatically send email notification of such filing to the attorney(s) of record.

/s/ Lawanda N. Hodges

Lawanda N. Hodges, Esq.

Georgia Bar No. 547413

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